

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**VICTOR HASSINE, SAMUEL
HASSINE,**

Plaintiffs,

VS.

**LT. LARRY SHERMAN and
SECRETARY JEFFREY BEARD,
in their official capacities,**

Defendants.

Civil Action No. 03-212E

Judge McLaughlin
Magistrate Judge Baxter

MOTION FOR EXTENSION OF TIME

AND NOW, come the defendants, Lt. Larry Sherman and Secretary Jeffrey Beard, by their attorneys, Thomas W. Corbett Jr., Attorney General, Craig E. Maravich, Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief, Litigation Section, and plaintiff's Victor Hassine and Samuel Hassine, by their attorney, Jere Krakoff, and respectfully submit the following:

1. Discovery is scheduled to end at the end of this month.
2. Due to exigent circumstances, undersigned counsel is traveling out of state for an extended period concerning a family-medical issue.
3. The parties have engaged in discovery requests and are awaiting certain responses in order to proceed to the next phase of discovery and depositions.
4. Due to these exigent circumstances, defendants request an additional 60 days for discovery.

5. Additionally, this time will allow the parties to attempt to work out differences concerning discovery without having to resort to court intervention.

6. Efforts were made to contact plaintiff's counsel by telephone, fax and mail prior to the writing of this motion.

7. This request is not intended to prejudice any party nor is it believed such will occur.

CONCLUSION

WHEREFORE, it is respectfully requested this motion be granted.

/s/ Craig E. Maravich
CRAIG E. MARAVICH
Deputy Attorney General
Pa. I.D. #86219

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

OFFICE OF ATTORNEY GENERAL
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219

Date: August 16, 2005

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2005, I electronically filed the foregoing ***Motion to Extend Time*** with the Clerk of Court using the CM/ECF system. And I hereby certify that I have mailed the foregoing document by United States Postal Service to the following non CM/ECF participants:

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By: /s/ Craig E. Maravich
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